

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**  
Case No. 24-24228-CIV-ALTONAGA

MEGAN PETE, an individual

*Plaintiff,*

v.

MILAGRO ELIZABETH COOPER,  
an individual,

*Defendant.*

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**UNOPPOSED MOTION TO WITHDRAW AS LOCAL COUNSEL  
BY ATTORNEY MICHAEL A. PANCIER, ESQ.  
FOR DEFENDANT, MILAGRO ELIZABETH COOPER**

Pursuant to Southern District of Florida Local Rule 11.1(d)(3) and Rule 4-1.16(b) of the Rules Regulating the Florida Bar, Michael A. Pancier, Esq. (“Undersigned Counsel”) files his Motion to Withdraw as Local Counsel of Record for Defendant, MILAGRO ELIZABETH COOPER (“Defendant”), and in support states the following:

**PRELIMINARY STATEMENT**

1. Undersigned Counsel was retained as local counsel by Defendant in the above-referenced matter.
2. Michael Hayden, Esquire and Unite the People, Inc. are lead counsel for Defendant, appearing *pro hac vice*.
3. Due to irreconcilable differences which have arisen between the Undersigned Counsel and Defendant along with Unite the People, Inc., Undersigned Counsel seeks to withdraw from representation of Defendant as local counsel in this matter.

**Specific Basis for Withdrawal**

4. Irreconcilable differences have arisen between Undersigned Counsel, Defendant, and Unite the People, Inc. making it unreasonably difficult for Undersigned Counsel to continue to effectively represent Defendant as local counsel in this matter.

5. Defendant and Unite the People, Inc. have not met their financial obligations to compensate Undersigned Counsel to continue to act as Local Counsel in this matter thereby rendering continued representation unreasonably difficult and a burden on Undersigned Counsel.

**Conferral With Counsel for Plaintiff**

6. On May 14, 2025, Undersigned Counsel notified counsel for the Plaintiff via email of his intention to withdraw as Local Counsel from this matter and can represent that Counsel for Plaintiff is unopposed to the instant Motion to Withdraw provided it will not delay the case, including Ms. Cooper's upcoming deposition, which it should not as lead counsel will be able to handle these matters as most if not all of them are taking place outside the State of Florida.

7. Defendant and lead counsel have also been advised of the Undersigned Counsel's motion and have no objection.

8. A proposed order is being submitted to the Court under separate cover.

**MEMORANDUM OF LAW**

Pursuant to Rule 4-1.16(b) of the Rules Regulating the Florida Bar, a lawyer may withdraw from representing a client if: "(1) withdrawal can be accomplished without material adverse effect of the interest of the client; (2) the client insists upon taking action that the lawyer considers, repugnant, imprudent, or with which the lawyer has a fundamental disagreement; (3) the client fails substantially to fulfill an obligation to the lawyer regarding the lawyer's services and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled; (4) the

representation will result in an unreasonable financial burden on the lawyer or has been rendered unreasonably difficult by the client; or (5) other good cause for withdrawal exists.”

Given the irreconcilable differences which have arisen between Undersigned Counsel and Defendant and Unite the People, Inc., sufficient good cause exists to permit the withdrawal of Undersigned Counsel as local counsel of record for Defendant. Specifically, Defendant and Unite the People, Inc. have not met their financial obligation to compensate Undersigned Counsel to continue to act as Local Counsel. This makes it an unreasonable burden for Undersigned Counsel to continue to represent Defendant. Further, given that all of the remaining depositions will be conducted in California or remotely, Mr. Hayden with Unite the People, Inc., as lead counsel can continue to represent the Defendant while searching for new Local Counsel and as such, there will be no material adverse effect on the Defendant, and further, there will be no need to extend the current deadlines or delay any of the currently scheduled depositions.

Based on the foregoing, undersigned counsel respectfully requests that the Court grant the instant Motion in its entirety, entering an order:

(1) granting this Motion in its entirety and authorizing Michael A. Pancier, Esquire of Michael A. Pancier, P.A., to withdraw as local counsel of record for Defendant, MILAGRO ELIZABETH COOPER, relieving said counsel of any and all further obligations on behalf of Defendant in this action;

(2) providing Defendant, MILAGRO ELIZABETH COOPER with a time period deemed sufficient by this Court to retain successor local counsel; and

(3) directing all interim pleadings, motions, discovery, and any and all other communications concerning this matter to continue to be sent lead counsel Michael Hayden, Esq.

of Unite the People, Inc. with copies to be mailed to Milagro Elizabeth Cooper, 15500 Cutten Rd Apt 4801, Houston, Tx 77070-4077.<sup>1</sup>

**CERTIFICATE OF CONFERRAL PURSUANT TO SOUTHERN  
DISTRICT OF FLORIDA LOCAL RULE 7.1(3)**

Pursuant to Southern District of Florida Local Rule 7.1(3) I HEREBY CERTIFY that a good faith effort to resolve the issues by agreement occurred and Plaintiff's counsel has indicated that Plaintiff does not oppose the relief sought herein.

*s/ Michael A. Pancier, Esq.*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 15, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing is being served this day on all counsel of record in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel who are not authorized to receive Notice of Electronic Filing.

By: *s/ Michael Pancier*  
Michael Pancier  
Fla Bar No. 958484

**Service List:**

All counsel of Record  
Milagro Elizabeth Cooper, (via email)

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<sup>1</sup> In conformity with Southern District of Florida Local Rule 11.1(d)(3)(A) this Motion includes a current mailing address for Defendant.